

To: Gravatt, Dan[Gravatt.Dan@epa.gov]; Peterson, Mary[Peterson.Mary@epa.gov]; Washburn, Ben[washburn.ben@epa.gov]
From: Kiefer, Robyn V NWK
Sent: Mon 9/29/2014 2:43:54 PM
Subject: West Lake Article on bird strike hazard (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

FYI - St. Louis Post-Dispatch article

Fear of bird strikes factors into effort to solve landfill issues
http://www.stltoday.com/news/local/fear-of-bird-strikes-factors-into-effort-to-solve-landfill/article_0e3be008-3078-5d4a-a638-e3e032471944.html
St. Louis Post-Dispatch - St. Louis, MO - 9/28/2014

By JACOB BARKER

Beyond radioactive waste, burning trash and dangerous chemicals, there's another risk that could hamper construction of a protective barrier between Bridgeton and West Lake landfills.

Birds.

City of St. Louis officials have long worried that opening the landfills for any reason - and exposing the buried garbage - would attract birds, potentially threatening air traffic at nearby Lambert-St. Louis International Airport.

If the city's concerns about bird strikes aren't addressed, plans to build a barrier between the burning underground trash at Bridgeton Landfill and the buried radioactive waste at next-door West Lake could be doomed.

Because of a 2005 legal agreement, the city and its airport have an effective veto over any barrier plans submitted by Republic Services, the current landfill owner.

Worry about landfill-related bird strikes isn't new, but only in recent weeks has the concern been frequently mentioned as an obstacle to a project that was supposed to have already started months ago.

The Environmental Protection Agency, which oversees the landfill, has cited the bird risk extensively in recent community updates. And an Army Corps of Engineers report issued last month noted bird mitigation along with unmapped radioactive waste as a major obstacle to a barrier project.

But some residents - and a former air traffic controller-turned state legislator - say concern over birds is overblown and a stall tactic for a barrier that the landfill's owner never wanted to build.

City officials insist the only thing that concerns them is whether travelers are safe from bird strikes, and they won't meddle in the landfill politics that have drawn in local governments, the Missouri attorney general and the state's congressional delegation.

In fact, Lambert has been involved with the landfill since first making plans for its newest runway in the 1990s. Federal rules governing dumps near airports led to an agreement closing the landfill in 2005, which allowed Lambert to open the runway that stretches west into Bridgeton a year later.

Now, to begin construction on a barrier to block the burning Bridgeton Landfill from radioactive waste in West Lake, St. Louis and the airport must issue waivers to their 2005 agreement with the landfill, according to the corps report.

Any barrier plans must be accompanied by a bird mitigation plan that local authorities and the Federal Aviation Administration can accept, said Lambert airport director Rhonda Hamm-Niebruegge.

"We just have an obligation, from the airport's perspective, to protect the passengers coming in and out of this airport," she said.

COMPLICATIONS

Republic announced the barrier project last year despite its assurances that the underground fire was under control. The state's consultant has said the smoldering appears to be spreading toward West Lake, while Republic says it is contained and not expanding beyond the landfill's southern quarry.

Republic says the barrier will provide some peace of mind for residents, though the company still suggests the project may not be necessary.

While the barrier's construction initially seemed imminent - EPA earlier this year indicated work was expected to start soon - the project has turned out to be more complicated than first thought. The corps, in its recent report, suggested it would take another 18 months of design and study.

The corps cited numerous issues, including the unknown quantity and location of all the radioactive waste and the need to obtain waivers from the city and the airport.

Lambert's concern, however, isn't new. Even before Republic Services discovered the underground fire in December 2010, airport officials voiced worries that a large-scale removal of radioactive waste was problematic compared to EPA's initial plan to cap the waste.

"The USDA Wildlife Service has advised the city that uncovered radiologically impacted municipal waste at the West Lake Landfill will serve as a food attractant for a variety of bird species and increase the risk of bird/aircraft strikes at the Airport," Hamm-Niebruegge wrote in a letter to EPA in September 2010.

Now that the underground fire has reignited concern over West Lake, the barrier project has the airport and the city again watching the landfill closely. Mayor Francis Slay's chief of staff Jeff Rainford and Hamm-Niebruegge met with the EPA to discuss barrier options last month and were expected to do so again this month.

"As far as we know, it's quite possible they can build the barrier and mitigate the bird situation," Rainford said.

Republic spokesman Russ Knocke said the company has had conceptual discussions about the barrier with the EPA, but it is still waiting on the agency to say how and where it should be built.

Last month, the EPA asked Republic Services to submit more detailed barrier plans by mid-October, in part to develop a bird-control strategy that satisfies officials at Lambert and St. Louis. The EPA's latest community update on West Lake focused on the airport concerns. It says the Bridgeton landfill closed in 2005 "largely due to the risk of bird strikes that the open landfill posed to flight operations."

But data from the Federal Aviation Administration shows that the closure of the landfill did not lead to fewer bird strikes. Seven of 10 years with the most bird strikes have come after 2005.

Still, airport officials will play a main role in developing plans for the underground barrier at the landfill, according to the EPA.

"With so many passengers using an airport within the St. Louis urban metropolitan area, any bird strike on an aircraft could pose a significant safety threat to people both in the air and on the ground," said the agency's update from Sept. 4.

POSSIBLE SOLUTIONS

A group of community leaders including Michael Fulton, superintendent of Pattonville School District, and state Rep. Bill Otto, D-St. Charles, met last month with state Attorney General Chris Koster to discuss his lawsuit against Republic Services and other landfill issues.

At the meeting, Otto told Koster that there are several measures Republic and the airport could take to lessen the threat of bird strikes, including working at night, putting an inflatable cover over the work area or temporarily shutting down the closest runway, which is not heavily used.

Traps and noise devices are common methods to deal with birds, Hamm-Niebruegge said. Some sort of canopy or construction site, on the other hand, might run into issues because of height restrictions near the airport. But shutting a runway isn't an option.

Even at the runway nearest Bridgeton, she said, there were about 6,000 landings and 13,000 departures over the last 12 months.

"We don't know what their plan is going to say, but it would never involve closing a runway," she said.

Otto, who worked as an air traffic controller at Lambert from 1986 to 2007, said in an interview that Republic Services is exaggerating the potential threat from bird strikes.

"Republic is trying to use it as an excuse to not dig the trench or to slow down the needed improvements they have to do to protect the community," Otto said.

If the underground fire reaches radioactive materials or the surface at the landfill, as some experts have predicted, it would create a worse problem for the airport and the community than birds, he said.

"This trench is not a debatable issue," he said. "It has to be built or the radioactive material has to be moved out. Working around the potential of bird activity will be a piece of cake."

Hamm-Niebruegge said a barrier appears more feasible than complete removal of the radioactive material.

"That type of a dig-up is astronomical, and the ability, we think, to have an effective bird-mitigation plan with that type of a dig-up would be really, really challenging if not impossible," she said.

Republic Services has experience developing bird mitigation, and it has brought in consultants to help develop plans for a barrier project, Knocke said.

The option Republic appears to favor for the barrier would go partially through the contaminated West Lake area. It is expected to take the least amount of time and require the least amount of waste excavation.

"As you look at some of the other options, the level of complexity multiplies substantially," Knocke said. "Of the three, it's the most technically feasible and it would likely have the fewest bird-related hazards."

The corps agreed, also calling it the "most technically feasible." However, it would be installed through material affected by radioactivity, and not all of the radioactive material would be isolated from the underground fire in the Bridgeton landfill. Some would be on the other side, the corps said in its report.

Rainford said the city will await a plan with bird mitigation strategies from Republic Services and its regulators. But faster completion could pose fewer risks to air traffic.

"I can tell you, the longer, the more disruption there is at the landfill, the harder it is going to be to mitigate the bird situation," he said.

The city's say over the project won't be influenced by anything other than technical feasibility, Rainford said.

But rumblings over political connections and conflicts of interest have come up at recent community meetings about the landfill. Much of the concern has focused on Richard Callow, a communications and political consultant who often advises Slay and has also worked for more than year for Republic Services as it sought to handle the landfill and associated public relations headaches.

Callow is a "communicator, not a technical expert," Rainford said, and he hasn't been communicating with the mayor's office on preferred barrier locations.

"It's not really for us to say you should do Option A rather than Option C because of blank," Rainford said. "We're not getting involved in the politics or any of the other stuff. If the technical people at the airport and the FAA are satisfied the flying public is protected, we have no other basis" to reject a plan.

In an email, Callow said he hasn't discussed barrier alignments with anyone at City Hall.

"I am not an engineer. I am certain that no one thinks I am," he wrote. "I expect that my counsel is weighed accordingly.

"I am familiar with airplanes and birds. I do know that their presence in the same airspace is dangerous."

Classification: UNCLASSIFIED

Caveats: NONE